

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

BORRAH E. CAMPBELL II,)	
)	
Plaintiff)	
)	CIVIL ACTION NO.
v.)	2:06-CV-205-WHA-CSC
)	
UNITED PARCEL SERVICE, INC.,)	
)	
Defendant.)	
_____)	

**DEFENDANT UNITED PARCEL SERVICE, INC.'S FIRST REQUESTS FOR
PRODUCTION OF DOCUMENTS AND THINGS TO PLAINTIFF**

Defendant United Parcel Service, Inc. ("UPS"), hereby requests that Plaintiff Borrah E. Campbell II ("Plaintiff") produce the following documents and things pursuant to Federal Rules of Civil Procedure 26 and 34 and that Plaintiff supplement his production as required by Federal Rule of Civil Procedure 26(e).

UPS requests that Plaintiff produce and permit UPS to inspect and copy each of the following documents at the office of UPS's attorneys, Baxley, Dillard, Dauphin, McKnight, & Barclift LLP, 2008 3rd Avenue South, Birmingham, AL 35233, on May 24, 2006 at 10:00 a.m. (unless another mutually agreeable time and location is arranged between the parties).

Alternatively, Plaintiff may mail copies of these documents to the undersigned counsel for UPS at the law offices of Alston & Bird LLP, 1201 West Peachtree Street, Atlanta, Georgia 30309 on or before May 24, 2006.

DEFINITIONS AND INSTRUCTIONS

See Definitions and Instructions set forth in Defendant UPS's First Interrogatories to Plaintiff, which are served together with these requests.

REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS

1.

Produce all documents that evidence or relate to any complaints you made as a UPS employee to any one concerning your employment, alleged harassment, discrimination, or retaliation, including any correspondence you sent to any one or received from any one.

2.

Produce all documents relating to your employment with UPS, including employment applications, employee handbooks, policy statements, training manuals, benefit statements, collective bargaining agreements, and any correspondence you sent to any one or received from any one relating to your employment with UPS.

3.

Produce all statements, in any form, that you obtained from any person that relate to your employment with UPS or to any of the claims and allegations in your Amended Complaint.

4.

Produce all documents evidencing or relating to your efforts to obtain employment since your employment with UPS ended, including any employment applications, resumes, correspondence regarding potential employment, and any offer or rejection letters from potential employers.

5.

Produce all documents evidencing or relating to any lawsuits, charges, complaints, claims, or other legal actions in which you have participated since January 1, 1996.

6.

Produce all documents evidencing or relating to the damages you seek in your Amended Complaint, including documents relating to your income and earnings since your employment with UPS ended and documents relating to your consultation with or treatment by any healthcare provider.

7.

Produce all documents evidencing or relating to your indictment, charge, arrest, or conviction for any crime.

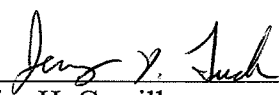
8.

Produce all documents, including notes, tapes, records, journals, or diaries, that you prepared or maintained at any time and that relate to your employment with UPS or to any of the claims and allegations in your Amended Complaint.

9.

Produce all of your federal, state, and local income tax returns, including supporting schedules, for the years 2001 – 2005.

Served this 21st day of April 2006.



Lisa H. Cassilly
Georgia Bar No. 116030
Jeremy D. Tucker
Georgia Bar No. 142484
ALSTON & BIRD LLP
1201 West Peachtree Street
Atlanta, Georgia 30309-3424
Tel. No. (404) 881-7000
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William J. Baxley (BAX001)
Donald R. James, Jr. (JAM016)
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McKNIGHT, & BARCLIFT
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Attorneys for Defendant United Parcel Service, Inc.

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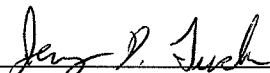
CERTIFICATE OF SERVICE

This is to certify that I have this date served a copy of the within and foregoing
**DEFENDANT UNITED PARCEL SERVICE, INC.'S FIRST REQUESTS FOR
PRODUCTION OF DOCUMENTS AND THINGS TO PLAINTIFF** by United States Mail
with adequate first class postage affixed thereon, addressed as follows:

Borrah E. Campbell II
38 Fairlane Drive
Montgomery, AL 36106

Plaintiff *pro se*

This 21st day of April 2006.



Jeremy D. Tucker